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June 13, 1997

BY HAND DELIVERY

Mr. William F. Caton
 Acting Secretary
 Federal Communications Commission
 1919 M Street, N.W., Stop Code - 1170
 Washington, D.C. 20554

**Re: Petition for Reconsideration filed by North Carolina Broadcasting Partners
 Sixth Report and Order; FCC 97-115; MM Docket No. 87-268**

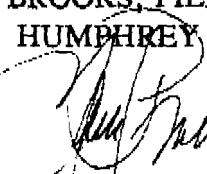
Dear Mr. Caton:

Transmitted herewith, on behalf of North Carolina Broadcasting Partners, licensee of Television Station WCCB(TV), Charlotte, North Carolina, are a facsimile of an original and eleven copies of a Petition for Reconsideration to be filed in the above-referenced matter.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

Very truly yours,

**BROOKS, PIERCE, McLENDON,
 HUMPHREY & LEONARD, L.L.P.**


 Mark J. Prak

Counsel to North Carolina Broadcasting Partners

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JUN 13 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

In the Matter of

Advanced Television Systems
and Their Impact upon the
Existing Television Broadcast
Service

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MM Docket No. 87-268

To: The Commission

**PETITION FOR PARTIAL RECONSIDERATION
OF THE SIXTH REPORT AND ORDER
SUBMITTED BY NORTH CAROLINA BROADCASTING PARTNERS**

This Petition for Partial Reconsideration of the Commission's *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*" or "*Allotment Order*") is submitted on behalf of North Carolina Broadcasting Partners ("NCBP"), licensee of WCCB (TV), Channel 18, Charlotte, North Carolina. In the *Sixth R&O*, the Commission allotted DTV Channel 21 as the paired DTV Channel for NTSC 18. NCBP submits this Petition for the Commission to reconsider its decision to allot DTV Channel 21 as WCCB's paired channel, because allotment of Channel 21 fails to achieve the Commission's goals of replication and maximization of the NTSC service area of NTSC Channel 18. As a result, NCBP requests that the Commission allot another DTV channel if proven superior to Channel 21.

According to the FCC's Table of Allotments in the *Sixth R&O*, WCCB's DTV allotment replicates only 89% of the station's NTSC service. Similarly, WCCB will experience a loss in area of 844,000 square kilometers. While the Commission predicts a gain in population to be served by WCCB, it is in the best interests of the community, and NCBP's public service obligations, to be able to continue to serve the population that has become accustomed to WCCB's programming. Since the station's DTV allotment will reach only 89% of the area currently served, it is possible that more than 176,000 regular viewers of WCCB will no longer be able to enjoy the station's programming.

Therefore, NCBP respectfully requests that the Commission reconsider its allotment of DTV Channel 21 to WCCB, and to study other potential allotments to determine if WCCB's NTSC service can be better replicated. NCBP is unable to recommend an alternate channel since the Commission has not yet released its methodology for determining interference in OET Bulletin No. 69.

Respectfully submitted, this the 13th day of June, 1997.

**NORTH CAROLINA BROADCASTING
PARTNERS**

By: 

Wade H. Hargrove

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